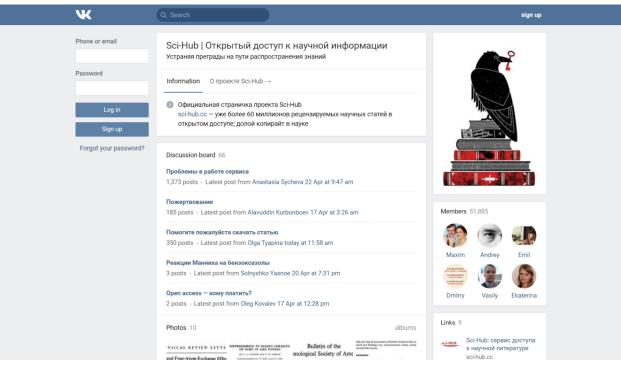
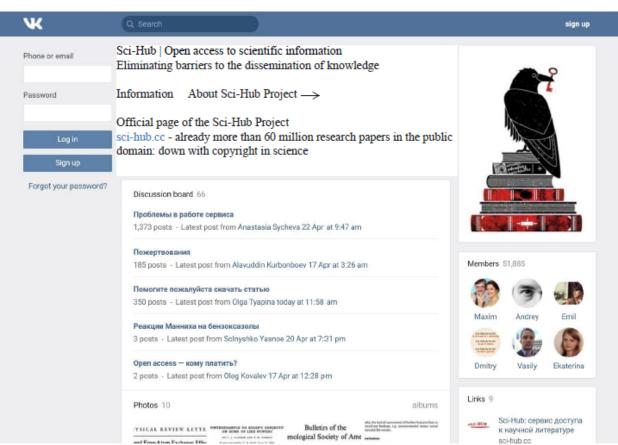
Exhibit D - Sci-Hub VK Page and Translation





UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ELSEVIER INC., ELSEVIER B.V., ELSEVIER LTD.

Index No. 15-cv-4282 (RWS)

Plaintiffs,

v.

SCI-HUB d/b/a WWW.SCI-HUB.ORG, THE LIBRARY GENESIS PROJECT d/b/a LIBGEN.ORG, ALEXANDRA ELBAKYAN, JOHN DOES 1-99,

Defendants.

DECLARATION OF DAVID LYNESS

- I, David Lyness, declare as follows is true and correct:
- I am an Account Manager with TransPerfect. My office address is 3 Park
 Avenue, New York, NY 10016.
- 2. I have reviewed the Declaration of Anthony Woltermann in Support of Plaintiffs' Motion for Default Judgment and Permanent Injunction in the above-titled action (the "Woltermann Declaration") and Exhibit D thereto.
- 3. I hereby affirm that TransPerfect Legal Solutions employees captured the Russian-language website screenshot on April 29, 2017, and that Exhibit D contains a true and correct copy of the website as it appeared on the day it was captured.
- 4. I hereby affirm that linguists contracted by TransPerfect Legal Solutions translated the text of the website screenshot referenced above and that, to the best of my

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knowledge and belief, the translation provided in Exhibit D to the Woltermann Declaration is a true and correct translation from Russian to English of that text.

I declare under penalty of perjury that the foregoing is true and correct.

Dated May 4, 2017.

David Lyness